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*Counsel to the Plan Administrator for the
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: Case No. 16-11700 (SMB)
Gawker Media LLC, *et al.*,¹ :
: (Jointly Administered)
Debtors. :
:-----x

**CERTIFICATE OF NO OBJECTION TO
PLAN ADMINISTRATOR'S MOTION, ON BEHALF OF THE DEBTORS, FOR
ENTRY OF ORDER AUTHORIZING DESTRUCTION OF BOOKS AND RECORDS**

1. On February 25, 2019, William D. Holden, as the plan administrator (the “Plan Administrator”) for Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”) and Gawker Hungary Kft. “v.a.”, f/k/a Kinja, Kft. (“Gawker Hungary” and together with Gawker Media and GMGI, the “Debtors”) filed the *Plan Administrator’s Motion, on Behalf of the Debtors, for Entry of Order Authorizing Destruction of Books and Records* [Docket No. 1191] (the “Motion”).

2. Concurrent with the filing of the Motion, the Plan Administrator filed the *Notice of Hearing on Plan Administrator’s Motion, on Behalf of the Debtors, for Entry of Order Authorizing*

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The offices of the Debtors are located at 44 Lynden Street, Rye, New York 10580.

Destruction of Books and Records (the “Notice of Hearing”), scheduling a hearing on the Motion for March 14, 2019, at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”).

3. On February 25, 2019, the Debtors’ claims and noticing agent, Prime Clerk LLC, served the Notice of Hearing and Motion as set forth in the *Affidavit of Service* [Docket No. 1192].

4. Objections to the Application were due no later than March 7, 2019 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

5. The undersigned certifies that the Plan Administrator has not received any answer, objection or other responsive pleading with respect to the Motion, and that no such answer, objection or other responsive pleading has appeared on the Bankruptcy Court’s docket in the above-captioned chapter 11 cases.

6. There having been no answer, objection, or other responsive pleadings filed by the Objection Deadline, the Plan Administrator respectfully requests that the Court enter the proposed order granting the Motion, annexed hereto as **Exhibit A**.

Dated: March 11, 2019
New York, New York

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Debtors*

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Gawker Media LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

**ORDER AUTHORIZING THE PLAN ADMINISTRATOR TO DESTROY
THE DEBTORS' BOOKS AND RECORDS**

Upon the motion (the “Motion”)² of the Plan Administrator for entry of an order, pursuant to sections 105(a) and 554 of the Bankruptcy Code and Bankruptcy Rule 6007, authorizing the destruction of the Debtors’ books and records, including, without limitation, the books and records listed on Exhibit B of the Motion (the “Books and Records”); and it appearing that this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been given; and after due deliberation and it appearing that sufficient cause exists for granting the requested relief and that the relief requested pursuant to the Motion is in the best interests of the Debtors:

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED to the extent set forth herein.
2. The Plan Administrator is authorized to immediately destroy, cause to be destroyed, or hire third parties to destroy the Books and Records.

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The offices of the Debtors are located at 44 Lynden Street, Rye, New York 10580.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

3. The Plan Administrator is authorized to execute and deliver all instruments and documents and take such other action as may be necessary or appropriate to implement and effectuate the transactions contemplated by this Order.

4. This Order shall be effective and enforceable immediately upon entry.

5. This Court retains jurisdiction with respect to all matters arising from or related to the interpretation and implementation of this Order.

Dated: _____, 2019

New York, New York

STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE